

Wilder, Ceciley

From: Rivera, Shirley
Sent: Friday, January 10, 2014 2:20 PM
To: Latha K. Toopal; Pervinder Tandon
Cc: Aquitania, Manny
Subject: RE: (ADEQ) RE: Draft permit documents for Freeport McMoRan Morenci (FMMI) Renewal Permit #57883

Latha,

Thanks for the reminder. I do recall this. That said, here is the following update/correction ... presuming the following -

- There are no substantive changes to the 30-day draft public comment version that we reviewed, and
- There are no additional comments for which ADEQ must respond such that there would be substantive changes to the permit, and
- The proposed permit for EPA's 45-day review is essentially the same permit language/requirements we reviewed (and discussed this morning) -

- then we understand the following will occur -

- ADEQ will forward the proposed permit for EPA's 45-day review, and
- if applicable, on the day of receipt, EPA will reiterate our comment (e.g., reference to Administrator), however, we understand ADEQ intends to address our comment in the proposed version we receive, and
- if the proposed permit addresses our comment, that will end EPA's review of the permit, and
- shortly thereafter, ADEQ will issue a final version of the Title V renewal permit.

- Shirley

From: Latha K. Toopal
Sent: Friday, January 10, 2014 12:34 PM
To: Rivera, Shirley; Pervinder Tandon
Cc: Aquitania, Manny
Subject: RE: (ADEQ) RE: Draft permit documents for Freeport McMoRan Morenci (FMMI) Renewal Permit #57883

Hello Shirley,

Thank you for your efforts in reviewing the permit. We will look into the NSPS reporting requirements and where deemed necessary will include the Administrator as well.

There seems to be a little confusion over the start of the EPA review period. Back in October EPA had agreed to perform a concurrent review of the permit during the public notice period. A copy of the email is attached. The public notice ends on 1/11/2014. So far we have not received any comments from the public. Could you clarify the correct end date?

Thank you.

Latha Toopal

602 771 2273

From: Rivera, Shirley [<mailto:Rivera.Shirley@epa.gov>]

Sent: Friday, January 10, 2014 1:07 PM

To: Pervinder Tandon; Latha K. Toopal

Cc: Aquitania, Manny

Subject: (ADEQ) RE: Drafdt permit documents forFreeport McMoRan Morenci (FMMI) Renewal Permit #57883
Pervinder,

Thank you for the opportunity to review the proposed Title V permit renewal -

FACILITY NAME: Freeport McMoRan Morenci, Inc.

ACTION: Title V Renewal

PERMIT: Air Quality Permit No. 57883

The following presents an overview of our telephone conversation (this morning) regarding the 30-day draft public comment version of the above noted permit. Upon receipt of your Agency's formal request for EPA's 45-day review period of the proposed renewal, we will submit our comments at that time and confirm the end of the 45-day period. If there are additional substantive revisions to the draft permit, we will conduct an additional review of those revisions and include, if applicable, additional comments.

NSPS - There are various requirements for notifications, reporting, plan submittals, etc. We note that the permit references the Director (i.e., ADEQ). As discussed, at a minimum, there are select requirements for which EPA Region 9 (i.e., Administrator) should be referenced. Therefore, where applicable, we request that the reference to "and Administrator" be added to various permit conditions associated with federal applicable NSPS requirements. I will follow-up with our Clean Air/TRI Enforcement Office to confirm which are those select requirements. Meanwhile, as you had mentioned, please feel free to review the NSPS delegation agreements which may make similar references. I will make note of the discussion we had regarding the following: (a) categorical source within the non-categorical source, (b) startup/shutdown/malfunction provisions, (c) AOS conditions and minor revisions, and (d) testing frequencies. Based on our discussion, I will not be providing comments on these topics. I appreciate the background you provided.

Feel free to contact me at (415) 972-3966 if you have any questions or concerns.

- Shirley

From: Pervinder Tandon <Tandon.Pervinder@azdeq.gov>

Sent: Tuesday, November 12, 2013 1:56 PM

To: Rivera, Shirley

Cc: Pervinder Tandon

Subject: Drafdt permit documents forFreeport McMoRan Morenci (FMMI) Renewal Permit #57883

Hi Shirley,

We have completed work on draft documents for renewal permit for FMMI. We have sent the draft documents to FMMI for their review before Public Notice. In view of this, I presume that it will be appropriate to send the advance copy of documents for your review as well. You have probably agreed for a concurrent review of the documents with public notice time period. This will provide you some additional time for review of draft documents.

Please contact me if you have any questions,

Thanks,

Pervinder K Tandon

Environmental Engineering Specialist

Existing Source & General Permits Unit

Email: pkt@azdeq.gov

Ph: (602) 771-2358

Fax: (602) 771-2366

NOTICE: This e-mail (and any attachments) may contain PRIVILEGED OR CONFIDENTIAL information and is intended only for the use of the specific individual(s) to whom it is addressed. It may contain information that is privileged and confidential under state and federal law. This information may be used or disclosed only in accordance with law, and you may be subject to penalties under law for improper use or further disclosure of the information in this e-mail and its

attachments. If you have received this e-mail in error, please immediately notify the person named above by reply e-mail, and then delete the original e-mail. Thank you.

NOTICE: This e-mail (and any attachments) may contain PRIVILEGED OR CONFIDENTIAL information and is intended only for the use of the specific individual(s) to whom it is addressed. It may contain information that is privileged and confidential under state and federal law. This information may be used or disclosed only in accordance with law, and you may be subject to penalties under law for improper use or further disclosure of the information in this e-mail and its attachments. If you have received this e-mail in error, please immediately notify the person named above by reply e-mail, and then delete the original e-mail. Thank you.